

Mark E. Andrews
State Bar No. 01253520
Aaron M. Kaufman
State Bar No. 24060067
COX SMITH MATTHEWS INCORPORATED
1201 Elm Street, Suite 3300
Dallas, Texas 75270
(214) 698-7800
(214) 698-7899 (Fax)
mandrews@coxsmith.com
akaufman@coxsmith.com

COUNSEL FOR CITY BANK, TEXAS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	CASE NO. 12-40594-11
MEECHAM HOSPITALITY, LLC,	§	
	§	Chapter 11
	§	
DEBTOR.	§	

**LIMITED OBJECTION OF CITY BANK TO DEBTOR'S
SECOND AMENDED PLAN OF REORGANIZATION DATED JUNE 20, 2012**

**TO THE HONORABLE RUSSELL F. NELMS,
UNITED STATES BANKRUPTCY JUDGE:**

City Bank, Texas ("City Bank") files this objection (the "Objection") to the *Second Amended Plan of Reorganization Dated June 20, 2012* [Doc. No. 99] (the "Plan"), and would respectfully show the following:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A)&(L). Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

II. LIMITED OBJECTION

2. On or about June 11, 2012, City Bank filed its objection [Doc. No. 97] (the “Objection”) to the Debtor’s *First Amended Plan of Reorganization Dated April 30, 2012* [Doc. No. 78] (the “First Amended Plan”). The Debtor filed the present Plan on June 20, 2012. The Objection is incorporated herein by reference as are City Bank’s objections to any deficiencies in the First Amended Plan, to the extent they were not cured by the present Plan.

3. City Bank continues to confer with the Debtor in an effort to resolve its objections to the Plan. Based on prior discussions among counsel, City Bank believes the Debtor will file subsequent modifications to the Plan to resolve outstanding objections. In the interest of preserving its rights in the event that the parties cannot resolve their current disputes, and to further reserve all rights to object to any modifications to the Plan, City Bank hereby files this objection and reserves all rights with respect to the Debtor, its Plan and City Bank’s collateral.

III. CONCLUSION AND PRAYER

WHEREFORE, City Bank respectfully requests an order denying confirmation of the Plan and providing such other and further relief to which it is justly entitled.

Dated: July 27, 2012

Respectfully submitted by,

/s/ Mark E. Andrews

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COX SMITH MATTHEWS INCORPORATED

1201 Elm Street, Suite 3300

Dallas, Texas 75270

Telephone: 214.698.7800

Facsimile: 214.698.7899

E-Mail: mandrews@coxsmith.com

E-Mail: akaufman@coxsmith.com

COUNSEL TO CITY BANK, TEXAS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of July, 2012, a true and correct copy of the foregoing Objection was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system and upon those additional parties listed on the attached Service List by email and/or First Class United States Mail postage prepaid, unless otherwise noted.

/s/ Aaron M. Kaufman

Aaron M. Kaufman

SERVICE LIST

Meecham Hospitality, LLC

2100 Estes Park Drive
Southlake, TX 76092

Clayton D. Ketter

Phillips Murrah P.C.
101 N. Robinson, 13th Floor
Oklahoma City, OK 73102
cdketter@phillipsmurrah.com

Jeff Carruth

Weycer, Kaplan, Pulaski & Zuber, P.C.
3030 Matlock Rd., Suite 201
Arlington, Texas 76015
jcarruth@wkpz.com

Office of the U.S. Trustee

1100 Commerce St., Room 976
Dallas, TX 75242-1496
ECF: ustpreion06.da.ecf@usdoj.gov

Joyce Lindauer

Arthur I. Ungerman

8140 Walnut Hill Lane, Suite 301
Dallas, Texas 75231

NOTICES OF APPEARANCE

Eagle Mountain-Saginaw ISD

c/o Elizabeth Banda Calvo
Perdue, Brandon, Fielder, Collins & Mott,
L.L.P.
PO Box 13430
Arlington TX 76-94-0430
Email: ebcalvo@pbfc.com

Tarrant County

c/o Laurie Spindler Huffman
Linebarger Goggan Blair & Sampson, LLP
2323 Bryan St., #1600
Dallas, TX 75201
ECF: dallas.bankruptcy@publicans.com

William A. Frazell

Assistant Attorney General
Bankruptcy & Collections Division
PO Box 12548
Austin, Texas 78711-2548

Christopher B. Mosley

Senior Assistant City Attorney
City of Fort Worth
1000 Throckmorton Street
Fort Worth, Texas 76102

Nathan W. Shackelford

Alston & Bird LLP
2828 N. Harwood street, Suite 1800
Dallas, Texas 75201

Lieb M. Lerner

Alston & Bird LLP
333 South Hope Street, Sixteenth Floor
Los Angeles, California 90071

Kevin M. Lippman

Munsch Hardt Kopf & Harr, P.C.
3800 Lincoln Plaza
500 N. Akard Street
Dallas, Texas 75201-6659